REMARKS

Claims 1-8 are all the claims pending in the present application. In summary, the

Examiner maintains the same rejections set forth in the previous Office Action, and adds a few

new arguments in the *Response to Amendment* section of the present Office Action on pages 2-3.

Specifically, claims 1-8 remain rejected under 35 U.S.C. § 102(e) as allegedly being anticipated

by Cheng et al (U.S. 2001/0032273).

In the previous Amendment, it was argued that Cheng does not teach or suggest at least,

"a function control converting section for converting a function control demand by one of said

IP-based networks to a function control command for one of said non IP-based networks ..." as

recited in claim 1, and it was argued that claim 7 was patentable for at least similar reasons. In

response, the Examiner alleges:

> Cheng discloses that a user at a web browser (210) activates the URL
> (makes a function control demand) of the HAVi web server, establishing an IP
> connection between the browser and the HAVi web server 350 (See Paragraph
> 0036). Cheng further discloses that the request is carried out by the executor 360
> using underlying HAVi requester services (function control commands for said
> non IP network). Cheng discloses that the home page is displaced on the browser
> 210 in the IP network, thus when the user clicks a link, IP based information is
> sent from the browser 210 to the web service executor 360 via the HAVi web
> server. ...

> Cheng discloses a web page displayed on a browser 210 from which a user
> may issue a control command from an IP based network (Paragraph 0038, lines 1-
> 4) which in turn invoke HAVi services (control commands relevant to a target
> device) and control HAVi devices 250 in a non IP network (Fig. 2, Paragraph
> 0038, line 5). Further, Cheng explicitly states that commands are sent to the web
> server 350 in the non IP network from the web browser in the IP network
> (Paragraph 0038).

The Examiner appears to be relying on the following language of Cheng: "the encoding of these messages into and from the web protocol," (at [0038] of Cheng) to allegedly satisfy the feature of converting a "function control demand" of IP-networks to a "function control command" of non IP-networks, as described in claim 1. However, Applicants submit that the quoted portion of Cheng above simply states that a web protocol is used to transmit the messages of Cheng using a web browser 210; to the contrary, there is absolutely no mention of "a function control converting section for <u>converting</u> a function control demand by one of said IP-based networks to a function control command for one of said non IP-based networks," as recited in claim 1. Cheng clearly does not satisfy at least this particular feature of claim 1, and does not satisfy a similar feature set forth in claim 7. Therefore, at least based on the foregoing, Applicants maintain that independent claims 1 and 7 are patentably distinguishable over Cheng.

Applicants submit that dependent claims 2-6 and 8 are patentable at least by virtue of their respective dependencies from independent claims 1 and 7.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.
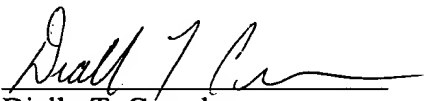
Respectfully submitted,

SUGHRUE MION, PLLC   Diallo T. Crenshaw
Telephone: (202) 293-7060   Registration No. 52,778
Facsimile: (202) 293-7860

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